

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED** \_\_\_\_\_

**RICHARD CACERES,** : **VIOLATIONS:**  
**ELIGIO DOMINGUEZ,** : **21 U.S.C. § 841(a)(1)**  
**LUIS CAPELLAN-SOSA** : **(possession with intent to distribute more**  
: **than 100 grams of heroin - 1 count)**  
: **18 U.S.C. § 924(c)**  
: **(possession of a firearm in furtherance of**  
: **a drug trafficking crime - 1 count)**  
: **18 U.S.C. § 2**  
: **(aiding and abetting)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about May 25, 2005, in Philadelphia, in the Eastern District of  
Pennsylvania, defendants

**RICHARD CACERES,**  
**ELIGIO DOMINGUEZ, and**  
**LUIS CAPELLAN-SOSA**

knowingly and intentionally possessed with the intent to distribute, and aided and abetted the  
possession with intent to distribute of, more than 100 grams, that is, approximately 220 grams, of  
a mixture or substance containing a detectable amount of heroin, a Schedule II controlled  
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and  
Title 18, United States Code, Section 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**RICHARD CACERES,  
ELIGIO DOMINGUEZ, and  
LUIS CAPELLAN-SOSA**

knowingly possessed a firearm, that is, a Colt Delta Elite Government Model, 10 mm handgun,  
loaded with ammunition, in furtherance of a drug trafficking crime for which they may be  
prosecuted in a court of the United States, that is, possession with the intent to distribute heroin  
in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**